

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In Proceedings Under  
Chapter 11 of the  
United States Bankruptcy Code

IN RE:

Case No.: 19-32528 (MBK)

GEORGE SARIOTIS

Honorable Michael B. Kaplan, U.S.B.J.

Debtor.

Hearing Date: January 7, 2021

**TWO RIVER COMMUNITY BANK'S RESPONSE TO DEBTOR'S APPLICATION  
FOR APPROVAL OF DISCLOSURE STATEMENT**

Secured Creditor Two River Community Bank ("**Two River**") respectfully submits the within response to Debtor George Sariosis' application for approval of Debtor's December 2, 2020 Disclosure Statement (the "**DS**"). *See* CM/ECF Doc. No.: 60. In support thereof, Two River respectfully states as follows:

1. Two River does not object to the approval of the DS as it appears to satisfy section 1125 of the Bankruptcy Code that requires the DS to provide creditors with "adequate information".

2. Notwithstanding same, Two River expressly reserves and does not waive its rights to object to the confirmation of the Debtor's proposed Chapter 11 Plan (the "**Plan**"), including, but not limited to, objections related to the unnecessarily long proposed period to market and sell certain properties identified under the Plan (the "**Properties**") and the fact that the Plan does not provide for adequate protection payments to Two River during the time

period contemplated between Plan confirmation and the sale of the Properties.

3. Two River also reserves all rights to comment upon and object to the form of any order presented to the Court in connection with the DS and Plan.

**MEYNER AND LANDIS LLP**  
*Attorneys for Secured Creditor*  
*Two River Community Bank*

By: /s/ Matthew P. Dolan  
Matthew P. Dolan

DATED: December 23, 2020